

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BODIES OUTSIDE OF UNJUST LAWS:)	
COALITION FOR REPRODUCTIVE)	
JUSTICE & LGBTQ+ LIBERATION,)	
ANDREW THAYER, KRISTI)	
KEORKUNIAN, and LINDA LOEW,)	
)	
Plaintiff,)	
)	
v.)	
)	No. 24-cv-3563
CITY OF CHICAGO, TOM CARNEY, in)	
his official capacity as Commissioner of the)	
Chicago Department of Transportation, and)	
LARRY SNELLING, in his official)	
capacity as Superintendent of the Chicago)	
Police Department.)	
)	
Defendants.)	
)	

PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

Plaintiffs move pursuant to Federal Rule of Civil Procedure 65(a) and other provisions of law for the Court to issue a preliminary injunction against Defendants containing the following relief:

- (1) Enjoining all Defendants from enforcing the unconstitutional requirements of the City of Chicago Parade Permit Ordinance as described in Plaintiffs' Verified Complaint;
- (2) Enjoining Defendants City of Chicago and Larry Snelling from enforcing Section II of Chicago Ordinance 2024-0008373; and
- (3) Ordering Defendants City of Chicago and Tom Carney to grant Plaintiff Bodies Outside of Unjust Laws a parade permit allowing them to march on August 18, 2024, at a time and along a route that allows them to communicate to delegates attending the Democratic National Convention.

The motion is based on the pleadings, papers, and records that are filed or will be filed with the Court, including the Verified Complaint and its exhibits (and any subsequent amendments thereto), as well as the instant motion and the associated Memorandum of Law in Support of Plaintiff's Motion for a Preliminary Injunction attached as Exhibit 1 to Plaintiff's Motion to File Instantly a Brief Exceeding the Page Limit.

Dated: May 2, 2024

Respectfully submitted,

/s/ Rebecca K. Glenberg
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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on May 2, 2024, she caused a copy of the above and foregoing PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION to be served on the following:

Via Process Server

City of Chicago
121 N. LaSalle St., Room 107
Chicago, IL 60602

Tom Carney
Commissioner
Chicago Department of Transportation
2 N. LaSalle St., Ste. 1110
Chicago, IL 60602

Larry Snelling
Superintendent
Chicago Police Department
3510 South Michigan Ave.
Chicago, IL 60653

/s/ Rebecca K. Glenberg_____